

WWR# 9821697

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS (CHICAGO)

In Re:

James R. Smith, Jr. and Cheryl L. Smith,  
Debtor(s),

Case No. 07-16279  
Chapter 13  
Hon. Janet S. Baer

/

**GUARDIAN CREDIT UNION AS ASSIGNEE OF CENTRAL STATES MORTGAGE COMPANY'S RESPONSE TO TRUSTEE'S NOTICE OF FINAL CURE PAYMENT**

NOW COMES Guardian Credit Union as assignee of Central States Mortgage Company pursuant Fed. Bankr. R. 3001(g) and disagrees with the Trustee's Notice as follows:

1. Respondent states that any pre-petition arrearage has been cured.
2. Respondent further states that the post-petition ongoing payments are not current.

The amount past due is \$5,880.60. This Response and the itemized statement attached serve as a Supplement to Respondent's Proof of Claim.

THEREFORE, Guardian Credit Union as assignee of Central States Mortgage Company does not agree that the plan is complete.

Respectfully submitted,

**WELTMAN, WEINBERG & REIS CO., L.P.A.**

Date: October 26, 2012

By: /s. Monette Cope

Monette Cope (ARDC# 6198913)  
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Guardian Credit Union as assignee of Central States  
Mortgage Company

**PROOF OF SERVICE**

Creditor, Guardian Credit Union as assignee of Central States Mortgage Company, filed its Response to Trustee's Notice of Final Cure Payment. All parties were served a copy of the Response on October 26, 2012. The Response was served upon Debtor(s) by depositing the same in the U.S. Mail at 180 N. LaSalle St., Chicago, Illinois, postage prepaid and addressed as below. The remaining parties were served by the Court's CM/ECF electronic noticing.

James R Smith, Jr. and  
Cheryl L. Smith  
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Chicago, IL 60617

Nicole G Lawson, Esq.  
Attorney for Debtors  
The Lawson Law Group  
900 E. 162nd Street  
Suite 204  
South Holland, IL 60473

Tom Vaughn  
Chapter 13 Trustee  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603

Patrick S Layng, U.S. Trustee  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St., Room 873  
Chicago, IL 60604

Respectfully submitted,

**WELTMAN, WEINBERG & REIS CO., L.P.A.**

Dated: October 26, 2012

By: /s/ Audrey McClain  
Audrey McClain, Legal Assistant